

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

INGENIADOR, LLC

Plaintiffs,

v.

ALFRESCO SOFTWARE, INC.;
INTERWOVEN, INC; BLACKBOARD, INC.;
BRIDGELINE DIGITAL, INC.; EMC
CORPORATION; HEWLETT-PACKARD
COMPANY; INFORMATICA
CORPORATION; COMPULINK
MANAGEMENT CENTER, INC.; LEXMARK
INTERNATIONAL, INC.; MICROSOFT
CORPORATION; MUXEO CORPORATION;
OBJECTIVE CORPORATION USA, INC.;
ORACLE CORPORATION; SAP AMERICA,
INC.; SDL TRIDION, INC.; AND SPRINGCM
INC.,

Defendants.

Civil Action No. 3:11-cv-01840-GAG

JURY TRIAL DEMANDED

PATENT INFRINGEMENT

Motion in Compliance with Order

COMES NOW, Plaintiff **INGENIADOR, LLC** (hereinafter “Plaintiff” or “Ingeniador”), through the undersigned legal representation and very respectfully, states and prays as follows:

1. On December 16, 2011, Plaintiff filed four motions pertaining to the case at bar, including:

a. Omnibus Motion in Opposition to Defendants’ Hewlett-Packard, Microsoft, EMC, Nuxeo, Informatica, Oracle, Interwoven, SAP, Lexmark, Compuling, SpringCm, SDL Tridion and Alfresco’s Motion to Dismiss Pursuant to Fed. R. Civl. P. 12(b)(6) (Docket No. 165)

b. Omnibus Motion in Opposition to Defendants’ EMC, SpringCM and Compulink Management Center’s Requests for Transfer of Venue (hereinafter “Opposition to Transfer of Venue”) (Docket No. 166);

- c. Omnibus Motion in Opposition to Defendants' Blackboard Inc., Interwoven, Inc., SpringCM, Compulink Management Center and SDL Tridion Inc.'s Motions to Dismiss based on Lack of Personal Jurisdiction (hereinafter "Opposition to Lack of Personal Jurisdiction") (Docket No. 167);
- d. Brief in Opposition to Motions to Dismiss for Improper Joinder and/or Motions to Sever (hereinafter "Opposition to Improper Joinder or Sever") (Docket No. 168).

2. On this date, Plaintiff has provided courtesy copies of these motions and their corresponding exhibits to the Honorable Judge's chambers, in compliance with Docket No. 145.

WHEREFORE, it is respectfully requested that this Honorable Court take notice of the above.

I HEREBY CERTIFY: that on this same date, copy of this motion was filed with the Clerk of the Court, using the CM/ECF System which will send notification of such filing to the attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 19th day of December, 2011.

Attorneys for Ingeniador, LLC

Ferraiuoli LLC
221 Plaza, 4th Floor
221 Ponce de León Avenue
San Juan, PR 00917
Tel.: (787) 766-7000
Fax: (787) 766-7001

S/Cristina Arenas Solís
USDCPR 223511
e-mail: carenas@ferraiuoli.com